

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SWISSDIGITAL USA CO., LTD.,

*Plaintiff,*

v.

SAMSONITE INTERNATIONAL S.A.,

*Defendant.*

Civil Action No. 6:23-cv-00196-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF NEIL J. MCNABNAY IN SUPPORT OF  
SAMSONITE INTERNATIONAL S.A.'S REPLY IN SUPPORT OF  
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

I, Neil J. McNabnay, declare as follows:

1. I am an attorney with the law firm of Fish & Richardson P.C., counsel of record for Samsonite International S.A. I have personal knowledge of the facts stated herein, except those that are stated on information and belief and can testify completely thereto.

2. Attached as Exhibit E to this declaration is a true and correct copy of Plaintiff Swissdigital USA Co., Ltd.'s First Set of Interrogatories in Connection with Jurisdictional Discovery to Defendant Samsonite International S.A., dated July 21, 2023.

3. Attached as Exhibit F to this declaration is a true and correct copy of Plaintiff Swissdigital USA Co., Ltd.'s First Set of Requests for Production in Connection with Jurisdictional Discovery to Defendant Samsonite International S.A., dated July 21, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Dallas, Texas, this 25th day of July, 2023.

/s/ Neil J. McNabney  
Neil J. McNabney